



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:22-MJ-172

TERRY DALE WEBB (01)

CRIMINAL COMPLAINT

Alleged Offenses:

On or about July 31, 2021, in the Fort Worth Division of the Northern District of Texas, the defendant, **Terry Dale Webb**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is, a felony offense, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, to wit: a Taurus, PT 92AF, 9mm caliber pistol bearing serial number TPD78725, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

On or about July 31, 2021, in the Fort Worth Division of the Northern District of Texas, defendant **Terry Dale Webb**, did knowingly or intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

1. I, Special Agent Brent Gresham (Affiant), am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since September 2001. Affiant completed the Federal Law Enforcement Training Center (FLETC) Criminal Investigators Training Program and ATF New Professional Training in 2002. Affiant is presently assigned to the ATF Dallas Field Division Group II to investigate violations of Federal firearms and violent crime laws, to include drug offenses.

In my twenty years as a law enforcement officer, I have been involved in both state and federal drug investigations, including making arrests and executing federal search warrants. As a result, I am familiar with federal firearms and narcotics laws.

2. Affiant, under oath, duly states that the facts set forth in the affidavit are based on my personal knowledge and experience, and information provided by other law enforcement officers that are true and correct to the best of my knowledge.

3. On July 31, 2021, a Euless Police Department (EPD) Detective was given information from a concerned citizen that Terry Dale **WEBB** was recently released from prison and living at XXX Franklin Drive, Euless, Texas, and that **WEBB** is selling large amounts of methamphetamine.

4. The EPD Detective contacted an EPD Investigator who has a long history with **WEBB** and has arrested **WEBB** for possession of a controlled substance and manufacture and delivery of a controlled substance in the past.

5. On this same date, EPD Investigators began conducting surveillance at XXX Franklin Drive and observed a white male, who they knew was **WEBB**, exit the residence and enter a black Ford Edge leaving the residence.

6. Investigators followed the vehicle and observed the vehicle fail to stop at a stop sign and commit other traffic violation(s). Investigators contacted EPD officers to assist in a traffic stop of the vehicle.

7. An EPD officer attempted to initiate a traffic stop using his emergency lights. The vehicle continued to travel on the wrong side of the roadway and was failing to yield to the emergency lights.

The EPD officer then initiated his emergency sirens to attempt to have the vehicle come to a stop, but the vehicle continued to travel.

8. While traveling, the EPD officer observed many plastic baggies being thrown out from the front passenger side of the vehicle. The vehicle continued traveling while committing numerous traffic violations and finally came to stop back in front of XXX Franklin where it was originally seen leaving.

9. At this time, officers conducted a felony traffic stop and took **WEBB** into custody. Officers then cleared the vehicle, locating no other persons; however, an EPD officer observed a black handgun in a brown leather holster, in plain view, in the driver's floorboard. The firearm was seized and showed to be a black Taurus PT92AF, 9mm caliber pistol bearing serial number TPD78725.

10. Officers recovered plastic baggies that were seen being thrown out of the vehicle by **WEBB**. The plastic baggies contained suspected methamphetamine. The weight of the methamphetamine was over 200 grams. A presumptive test revealed positive results and laboratory analysis confirmed positive results for methamphetamine.

11. Due to Affiant's training and experience, Affiant knows that the amount of methamphetamine possessed by **WEBB** is more than personal use and is believed that the drugs were intended for sale/distribution.

12. A criminal history check of **WEBB** revealed that **WEBB** has multiple felony convictions to include Possession of a Controlled Substance in 2003 and Manufacturing/Delivery of a Controlled Substance in 2009 and 2013.

13. On August 17, 2021, Affiant, an ATF interstate nexus expert, examined photographs of the aforementioned firearm described in paragraph nine and determined the firearm was not manufactured within the State of Texas and that firearm would have to have traveled in interstate and/or foreign commerce to be present in the State of Texas.

14. Based upon the foregoing and to the totality of evidence, probable cause exists to believe that **WEBB** has violated 18 U.S.C. § 922(g)(1) and is a felon in possession of a firearm. Furthermore, **WEBB** has violated 21 U.S.C § 841(a)(1), possession of a controlled substance with intent to distribute or dispense.



Brent Gresham, Special Agent
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and subscribed in my presence on this 8th day of March 2022, in Fort Worth, Texas, at 1:31 p.m.



HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE